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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

JOSEPH LANDON, individually and
on behalf of all others similarly
situated,

Plaintiffs,

v.

ERNST & YOUNG LLP, a limited
liability partnership; ERNST &
YOUNG U.S. LLP, a limited liability
partnership; and DOES 1-100,
inclusive,

Defendants.

Case No. 2:08-cv-00889-GEB-DAD

**STIPULATION AND [PROPOSED]
ORDER TO TRANSFER ACTION
TO NORTHERN DISTRICT OF
CALIFORNIA**

1 Plaintiff Joseph Landon (“Plaintiff”) and Defendants Ernst & Young LLP and
2 Ernst & Young U.S. LLP (“Defendants”), by and through their respective counsel,
3 hereby agree and stipulate as follows:

4 **WHEREAS**, *Ho v. Ernst & Young LLP*, Case No. CV 05-04867 (“The *Ho*
5 Action”) was filed on September 27, 2005 in Santa Clara County Superior Court and
6 was removed to the United States District Court for the Northern District of California
7 on November 29, 2005;

8 **WHEREAS**, the instant action was filed in Placer County Superior Court on
9 February 21, 2008 and was removed to this Court on April 25, 2008;

10 **WHEREAS**, on May 5, 2008, Defendants filed a Motion to Transfer this action
11 to the Northern District on the grounds that it involves substantially similar claims and
12 putative classes to those alleged in the *Ho* Action, and therefore transfer would promote
13 the interests of justice and convenience to the parties and witnesses;

14 **WHEREAS**, Plaintiff does not oppose the Motion to Transfer;

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1 **THE PARTIES HEREBY STIPULATE** that this action should be transferred to
2 the Northern District and respectfully request an order to that effect.

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4 Dated: _____

LAW OFFICE OF STEVEN ELSTER

5 By _____
6 Steven Elster
7 Attorneys for Plaintiff Joseph Landon


8 Dated: _____

AKIN GUMP STRAUSS HAUER &
FELD LLP

9
10 By _____
11 Anastasia M. Boles
12 Attorneys for Defendant Ernst & YOUNG
LLPT and Ernst & Young U.S. LLP

13 **IT IS SO ORDERED.**

14
15 Dated: 6/5/08

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GARLAND E. BURRELL, JR.
United States District Judge